Application No. 10/678,977

Remarks

Claims 1-16 remain in the application.

Claim Rejections -- 35 USC 102

Claims 1, 10 and 14 stand rejected under 35 USC 102(e) as being anticipated by Bales (USP 7,246,168). Applicants respectfully traverse this rejection.

The latest rejection contends that col. 5, lines 19-28 and col. 7, lines 37-41 of Bales discloses the limitation of claim 1 which states, "clearing all medium access control (MAC) address entries from a MAC address table of the switch in response to the link failure detection and without receiving from outside the switch any signal that signifies that the MAC address table of the switch is to be cleared." (Emphasis added.) Applicants strongly disagree with this contention.

In particular, applicants respectfully submit that col. 5, lines 19-28, of Bales teaches removing only those entries corresponding to ports connected to failed devices, not removing all entries in the table. Specifically, it states, "... these device failures typically cause most commercially-available Ethernet switches to immediately flush all forwarding table entries corresponding to its ports connected to the failed devices." (Emphasis added.) Applicants respectfully submit that this teaching is contrary to the express language in claim 1 which requires clearing all MAC addresses entries in the table. In other words, while claim 1 clears all MAC addresses, even if the MAC addresses are for working devices connected to a working link, this citation to Bales teaches removing only select entries corresponding to ports connected to failed devices.

The citation to col. 7, lines 37-41, of Bales merely recites, "Each port may handle a plurality of medium access control (MAC) addresses from a plurality end stations. The switch 200 dynamically maintains entries of a conventional forwarding table 230, which may be implemented as Content Addressable Memory, to keep track of which ports access certain MAC addresses."

Applicants respectfully submit that this citation also does <u>not</u> teach the express

language in claim 1 which requires clearing <u>all</u> MAC address entries in the table (even if those MAC addresses are for working devices connected to a working link).

For at least the above-discussed reasons, applicants respectfully submit that claim 1 overcomes its rejection.

Similar to claim 1, claim 10 recites, "a plurality of ports wherein at least one port implements a link-loss-learn protocol wherein upon detecting a link failure at the port, the MAC address table is cleared of all MAC address entries therein without receiving from outside the apparatus any signal that signifies that the MAC address table of the apparatus is to be cleared." Hence, for the reasons discussed above in relation to claim 1, applicants respectfully submit that claim 10 also overcomes its rejection.

Also similar to claim 1, claim 14 recites, "wherein the link-loss-learn protocol comprises, upon detecting a link failure at a port of the switch, clearing a medium access control (MAC) address table of <u>all MAC</u> address entries therein, without receiving from outside the switch any signal that signifies that the MAC address table of the switch is to be cleared." Hence, for the reasons discussed above in relation to claim 1, applicants respectfully submit that claim 14 also overcomes its rejection.

Claim Rejections -- 35 USC 103

Claims 2-4, 7, 11-13, 15 and 16 stand rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624) in view of Bales (US 7,246,168). This rejection is respectfully traversed.

As discussed above, independent claims 1, 10 and 14 are patentably distinguished over Bales. The citation to Bare does <u>not</u> cure the deficiencies discussed above in regard to Bales. Therefore, applicants respectfully submit that dependent claims 2-4, 7, 11-13, 15 and 16 overcome this rejection.

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Claims 8--9 stand rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624) in view of Bales (US 7,246,168). This rejection is respectfully traversed.

As discussed above, independent claim 1 is patentably distinguished over Bales. The citation to Bare does <u>not</u> cure the deficiencies discussed above in regard to Bales. Therefore, applicants respectfully submit that dependent claims 8-9 overcome this rejection.

Claim 5 stands rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624) in view of Bales (US 7,246,168) and further in view of Eisen et al. This rejection is respectfully traversed.

As discussed above, independent claim 1 is patentably distinguished over Bales. The citations to Bare and Eisen et al. do <u>not</u> cure the deficiencies discussed above in regard to Bales. Therefore, applicants respectfully submit that dependent claim 5 overcomes this rejection.

Claim 6 stands rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624) in view of Bales (US 7,246,168) and further in view of Tanoue. This rejection is respectfully traversed.

As discussed above, independent claim 1 is patentably distinguished over Bales. The citations to Bare and Tanoue do <u>not</u> cure the deficiencies discussed above in regard to Bales. Therefore, applicants respectfully submit that dependent claim 6 overcomes this rejection.

Conclusion

For the above-discussed reasons, applicants respectfully submit that the application, as hereby amended, now overcomes all rejections from the office action. Favorable action is respectfully solicited.

If for any reason an insufficient fee has been paid, the Commissioner is hereby authorized to charge the insufficiency to Deposit Account No. 50-2427 of Okamoto & Benedicto LLP.

Respectfully Submitted,

Dated: September 30, 2008

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